



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

JEFFREY F. FRANK
Assistant Corporation Counsel
Email: jefrank@law.nyc.gov
Cell: (929) 930-0780
Tel: (212) 356-3541

July 25, 2022

VIA ECF

Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Peter Delgado v. City of New York, et al.*,
19 Civ. 6320 (JPC)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants in the above-referenced matter. With plaintiff's consent, defendants write to respectfully request that the Court grant a brief extension of the parties' time to file a joint status letter, from today until July 29, 2022. This is defendants' first request for an extension of this deadline.

By way of background, fact discovery closed on June 24, 2022, (Docket Entry ("DE") No. 84), and under the March 15, 2022 Civil Case Management Plan (DE No. 76), all discovery closed on July 18, 2022. The Civil Case Management Plan further directs the parties to submit a joint status letter by today, July 25, 2022. In that letter, the parties must advise the Court whether they request a referral to a Magistrate Judge for a settlement conference or to the Court-annexed mediation program. The parties must also advise whether any party plans to file a post-discovery motion and lay out the anticipated grounds for and against that motion.

As of this writing, defendants have not received an updated settlement demand from plaintiff. On July 19, 2022, defendants asked plaintiff to provide an updated settlement demand. Today, defendants followed up on that request, and plaintiff's counsel advised that an updated settlement demand is forthcoming. After defendants receive plaintiff's updated demand, they will require time to consider it and decide whether a settlement conference or mediation would be fruitful. Should the parties agree that neither is likely to be fruitful, defendants anticipate filing a motion for summary judgment. Therefore, the requested extension is necessary not only to allow the parties time to properly consider settlement, but also to allow the

parties to draft their respective portions of the joint status letter concerning defendants' anticipated summary judgment motion.

Accordingly, defendants respectfully request that the Court extend the parties' time to file a joint status letter until July 29, 2022.

Defendants thank the Court for its consideration herein.

Respectfully submitted,



Jeffrey F. Frank
Assistant Corporation Counsel
Special Federal Litigation Division

cc: All Counsel (via ECF)

This request is granted. The parties shall file the joint status letter by July 29, 2022. The Clerk of the Court is respectfully directed to close the motion pending at Docket Number 90.

SO ORDERED.

Date: July 26, 2022

New York, New York



JOHN P. CRONAN
United States District Judge